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September 27, 2021

VIA ECF

The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

So ordered,
/s/ Alvin K. Hellerstein
Alvin K. Hellerstein
9/28/21

RE: *United States v. Adael Figaro* 21 Cr. 132 (AKH)
Modification of Bail Conditions

Dear Judge Hellerstein:

I represent Mr. Adael Figaro in the above referenced matter. We write to respectfully request that the bail conditions set by Your Honor on September 15, 2021 be modified for Mr. Figaro to be able to go to work. Mr. Figaro has secured employment through Exquisite Staffing, LLC doing work for Cipriani Banquet Hall at 55 Wall Street, New York, New York.

Yesterday, September 26, 2021, Mr. Figaro was contacted by hiring manager Luis Diaz for Cipriani Banquet Hall. Mr. Diaz notified Mr. Figaro that a position with the Cipriani cleaning crew had become available and that Mr. Figaro was to report on Monday, September 27, 2021 to 55 Wall Street, New York, New York for an official interview and intake session. After Mr. Figaro's interview and intake session, he was officially offered the position. I had the opportunity to speak with the hiring manager today via telephone. Mr. Figaro was hired today as a member of the cleaning crew for Cipriani Banquet Hall. He has been assigned the overnight shift working from 10pm – 6am. His work schedule will vary depending on the number of events booked in a week at the banquet halls. His work schedule will be given to him every Friday evening for the upcoming week, so a set schedule is not known at this time. He will be paid \$15 per hour every week. His specific duties will be cleaning various catering halls and entertainment spaces, as well as setting up locations for events the night before. While Cipriani Banquet Hall has multiple locations, Mr. Figaro will only be obligated to work in the locations in Manhattan.

Mr. Figaro's current curfew allows him to be outside his home from 1pm to 7pm every day. With this new employment opportunity, we are requesting that Mr. Figaro be permitted to leave his home at 1pm and return home at 9am the next day only on the days that he is working. On the days that he is not working, we would request that his curfew be from 8am to 8pm. The plan is for Mr. Figaro to begin working tomorrow night, September 28, 2021. He will be reporting to 55 Wall Street, New York, New York.



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Mr. Figaro understands that should the Court modify his bail conditions as requested, he is permitted to stay out of his home overnight only for the purpose going to work for Cipriani Banquet Hall. Mr. Figaro further understands that on the days that he is not working, he is not permitted to stay out of his home overnight under any circumstances. Mr. Figaro understands that as soon as he gets his work schedule each Friday evening, he will forward that work schedule to his attorney and pre-trial services.

I have conferenced this matter with the Government and pretrial services and neither party has any objections to the proposed bail modification.

For those reasons, Your Honor's immediate attention is appreciated.

Respectfully submitted,



Esere J. Onaodowan, Esq.

CC via email: AUSA Patrick Moroney
Pretrial Officer Jonathan Lettieri